

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street - 10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director  
and Attorney-in-Chief

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

**BY ECF**

Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Mario Martinez Beltran,  
21 Cr. 473 (CM)

Dear Judge McMahon:

I write with the consent of the government to request adjournment of the conference currently scheduled for May 10 at 2:00 p.m. The parties are in the final stages of plea discussions, but we require additional time for translation, client counseling, and final agreement. This process will be delayed because I will be on trial in another matter beginning on May 17. Accordingly, we request that the appearance be adjourned to June 13 or 14 if the Court has availability on either of those dates.

The government consents to the requested adjournment and seeks the exclusion of time under the Speedy Trial Act. The defense consents to the exclusion of time under 18 U.S.C. § 3161(h)(7).

Respectfully submitted,  
/s/  
Clay H. Kaminsky  
Assistant Federal Defender  
(212) 417-8749 / (646) 842-2622

cc: AUSA Danielle Kudla

USDC SDNY
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